

E & E AFFAIRS

AMERICAN BOTTOMS
REGIONAL WASTEWATER TREATMENT FACILITY
1 AMERICAN BOTTOMS ROAD
SAUGET, ILLINOIS 62201
TEL (618) 337-1710
FAX (618) 337-8919

XC: Paul Tandler ^{A 2} 5/30/90
Susan Langetti
Carl Schaffer
Joe Burlough

153612

May 30, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

P 649 934 565

Mr. Joseph M. Grana
Cerro Copper Products Corporation
P.O. Box 66800
St. Louis, Missouri 63116-6800

Dear Mr. Grana:

Your compliance monitoring reports for January, February and March 1990 indicate recorded excursions for mercury at the east and west outfalls. Mercury concentrations at both locations were reported at <0.001 mg/l for January, 0.001 mg/l for February, and 0.002 mg/l for March.

As indicated on page seven (7) of your permit, the maximum monthly average limitation for mercury is 0.0005 mg/l. The corresponding daily maximum limit is 0.001 mg/l per the averaging rules of 35 Illinois Adm. Code Section 304.104. According to a U.S. EPA guidance document:

...the average of the samples taken in a calendar month constitutes the monthly average and should be compared to the standard. This could mean a monthly average based on only one sample or as many as 31 sampling events.

Since mercury is monitored once a month, the sampling results must be compared to both the daily and monthly limitations.

In accordance with the Pretreatment Ordinance and its standard operating procedures, we request that you submit a report within fourteen (14) days of receipt of this letter, which outlines and discusses the cause of these recorded effluent excursions and the precautions and procedures proposed to prevent further excursions.

If you have any questions or comments, please call.

Very truly yours,
VILLAGE OF SAUGET

By: Thomas G. Thompson
Thomas G. Thompson
Pretreatment Coordinator

TGT:msp

cc: Mr. George R. Schillinger
Mr. Harold G. Baker, Jr.

C05207



CERRO COPPER PRODUCTS CO.

P.O. Box 66800

St. Louis, MO 63166-6800

618/337-6000

A-2
5/24/90

*Village
Paramount*

May 24, 1990

George Schillinger
Plant Manager
American Bottoms Regional W.T.F.
1 American Bottoms Road
Sauget, Illinois 62201

Re: Cerro's Discharge Plans for
Last Half of 1990

Dear George:

Per your letter of May 18, 1990 requesting information of plans to modify discharges from our facility and planned construction projects in the second half of 1990, I have summarized Cerro's plans.

1. Dead Creek Sediment Removal Activity

As of May 21, 1990 Dead Creek can no longer flow naturally to the Village sewer system nor will the Village sewer system be able to back-up into Dead Creek during heavy rainfalls when the sewer system surcharges and the Creek acts as a retention basin.

Beginning late summer - early fall Cerro plans to start removal of contaminated sediments from Dead Creek. It is proposed that a dragline bucket will scrape the bottom of the creek bed to remove the contaminated sediment. Excavation would proceed from south to north to allow for the collection of the incident precipitation that will fall directly within the creek. The excavated material will be stockpiled within the confines of the creek in diked zones. It is proposed to create six zones by the installation of a fabric filter across the creek to retain the fines and promote drainage. The stockpiled sediment will remain within the creek but above the natural water level. In this manner the sediment will naturally release the entrained water without mechanical dewatering. Upon drainage the stockpiled material is intended to be loaded into rail cars and the excavated zone will be immediately backfilled with clean fill to fill the entire creek bed.

The only water that is expected to be pumped to the Village sewer system will be the rainwater that will enter the creek directly. The pumping of rainwater is needed because we only want to keep the naturally occurring water



A member of The Marmon Group of companies

C05208

level of 1 to 2 feet in the creek for ease of excavation. Since Cerro is not expected to pump groundwater, any water that is pumped to the Village sewers is water that would have normally flowed by gravity before Cerro eliminated the creek outlet. We plan to pump the rainwater through our new pump station for flow monitoring purposes.

2. Secondary Copper Scrubber Wastewater Pretreatment

Cerro currently is planning to install a wastewater pretreatment facility to treat the blowdown from Cerro's Anode Furnace Scrubber. The system is tentatively scheduled to go into operation before December 1, 1990. The new system will replace the temporary system put into service during the cadmium issue of 1988-1989. The new system will provide better treatment of the wastewater and a flow reduction of about 3,600 gallons per day because the discharge will be cascaded to another area of the plant for reuse.

3. Nickel Sulfate Recovery System

Cerro is scheduled to complete by July 1, 1990 it's Nickel Sulfate Recovery System which will eliminate the current discharge of about 2,000 gallons per day from the nickel hydroxide recovery system.

4. Bldg. 80 Recycle & Treatment System

Cerro is planning to construct a water recycle and pretreatment system for the Bldg. 80 Piercing Mill wastewater. This will result in a decrease of about 24,000 gallons per day when the Piercing Mill is running. The equipment is only operated 20 to 40 days per year.

In summary Cerro's discharges and pollutant loading to the POTW should decrease during the second half of 1990. If you would like to meet to further discuss our plans, please call and we can set a meeting date.

Very truly yours,



Joseph M. Grana
Manager of Environmental
and Energy Affairs

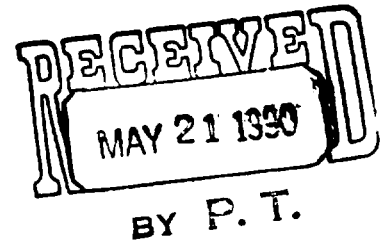
cc: P. Tandler

AMERICAN BOTTOMS
REGIONAL WASTEWATER TREATMENT FACILITY

1 AMERICAN BOTTOMS ROAD
SAUGET, ILLINOIS 62201

(618) 337-1710
FAX (618) 337-8919

May 18, 1990



Mayor Paul Sauget

Mr. David F. Adams (Ethyl Petroleum)
Mr. William J. Boyle, Jr. (Monsanto)
Mr. Allyn Conrad (Rogers Cartage Co.)
Mr. Horace Drake (Midwest Rubber)
Mr. James Gary (Trade Waste Incineration)
Mr. Charles J. Harbaugh (Clayton Chemical)
Mr. George M. Obeldobel (Big River Zinc)
Mr. Paul Tandler (Cerro Copper Products)
Mr. Paul H. Weis (P.H. Weis & Assoc.)


Gentlemen:

As part of the "Facility Plan" presently being developed by Consoer, Townsend & Associates for the P-Chem Plant, the future uses of the Stormwater Lagoon and Clarifier (CSO Basins) are being reviewed.

To complete this review process, we must know if your facility has any plans to modify its discharge after September 1, 1990 in any manner which has not already been fully described in your application for a pretreatment permit. This includes the use of dewatering wells for construction or other purposes, process changes which may change effluent quality, and temporary cleanup work at various plant facilities. If you have plans or are developing plans which are not consistent with your permit application or if you have plans to use dewatering equipment, we must have this information by May 25, 1990.

Your cooperation in providing the above information is appreciated.

Sincerely,


George R. Schillinger
General Manager

GRS:ld

c Gerald I. Brask (Consoer, Townsend & Assoc.)
Lee R. Cunningham (Gardner, Carton & Douglas)
Daniel J. Hayes (Baker & Hayes)

C05210

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

OTHER ADDRESSEES - FOR INFORMATION

A. 2

5/18/90

P. Tandler
R. E. Conreux
File

*Villars
Pro Treatment*

HQ-10 SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

TO: J. M. Grana

DATE: May 18, 1990

FROM: J. D. Burroughs

SUBJECT: POTW ANNUAL INSPECTION

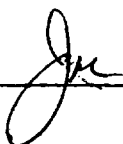
As per your memo of May 15, 1990, under the subject heading, Cerro was inspected by representatives of the American Bottoms Regional Treatment Facility on May 16, 1990. John Thiel and John Lauth, engineers from Horner & Shifrin, arrived at our offices shortly before 1:00 p.m. and departed the plant shortly after 4:00 p.m.

After the discussion by the four of us of the wastewater program and activities in your office, the inspectors were shown the following facilities and operations:

1. Extrusion Press - trough and concrete tank, compliance noted with anticipated modifications to assure a single point of discharge.
2. Tankhouse - no discharge of electrolyte to sewer but to slimes pointed out.
3. Slimes and Nickel Sulfate - only current discharge is decant from nickel hydroxide production and with startup of the nickel sulfate unit this will end.
4. Anode Furnace - noted blowdown of pond to scrubber system and operation of scrubber water metals removal system.
5. Billet Furnace and Pretreatment Unit - blowdown of the scrubber system to the pretreatment unit and operation of the unit were discussed. The inspectors completed a simple form regarding the pretreatment unit operation. The sampling point for the pretreatment unit discharge was pointed out at the inspector's request.

On May 17, I called John Lauth and requested that we be provided a copy of the form they had completed regarding the pretreatment unit and of their inspection report.

JDB/ge



C05211

Other Addressees

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

File

To: *

Date: May 15, 1990

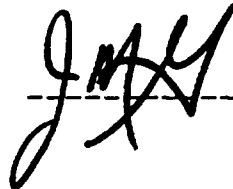
From: J. M. Grana

Subject: POTW Annual Inspection

* H. L. Schweich
P. Tandler
R. E. Conreaux
R. L. Deatherage
J. D. Burroughs

On 5/16/90 at 1:00 pm, two engineers from Horner & Shifrin, John Thiel and John Lauth, will be at Cerro as representatives of American Bottoms Wastewater Treatment Facility (POTW) for the purpose of the annual inspection. The POTW is required to make an annual inspection of its industrial users.

The inspection will include a visit to all regulated sources, extrusion press, piercing mill, foundry and refinery. Joe Burroughs will accompany the inspectors. A post inspection meeting will be held with Joe and myself to answer questions and determine the results of the inspection.



C05212